

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMEREN MISSOURI,

Defendant.

Case No. 4:11-CV-00077-RWS
Judge Rodney W. Sippel

AMEREN MISSOURI'S MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 13.05, and the Stipulated Protective Order Regarding Confidential Information and Documents (ECF # 90) entered by this Court, Ameren Missouri hereby moves to file certain exhibits to its Motion For a Protective Order Narrowing Certain Rule 30(b)(6) Deposition Topics Requested by EPA and accompanying Memorandum (ECF #'s 291, 292) under seal. The aforementioned filings contain information claimed by Ameren Missouri as subject to the Protective Order in this case.

WHEREFORE, Defendant Ameren Missouri respectfully requests that the Court grant this motion and order the relief requested herein.

Dated: July 17, 2014

Respectfully submitted,

/s/ Matthew B. Mock

Ronald S. Safer

Patricia Brown Holmes

Renee Cipriano

Steven J. Bonebrake

Matthew B. Mock

Joshua R. More

(All admitted *pro hac vice*)

SCHIFF HARDIN LLP

233 South Wacker Drive, Suite 6600
Chicago, Illinois 60606
(312) 258-5500
Fax: (312) 258-5600

James J. Virtel
ARMSTRONG TEASDALE LLP
7700 Forsyth Boulevard Suite 1800
St. Louis, Missouri 63105
(314) 621-5070
Fax: (314) 612-2298
jvirtel@armstrongteasdale.com

Counsel for Defendant Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2014, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record, who are listed below:

Andrew C. Hanson
Bradford T. McLane
Nigel B. Cooney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Telephone: (202) 305-0544
Facsimile: (202) 616-6584
andrew.hanson2@usdoj.gov
bradford.mclane@usdoj.gov
nigel.cooney@usdoj.gov

Suzanne J. Moore
Andrew J. Lay
United States Attorney's Office
Eastern District of Missouri
Thomas Eagleton U.S. Courthouse
111 South 10th Street, 20th Floor
St. Louis, MO 63102
Telephone: (314) 539-2547
Facsimile: (314) 539-2309
suzanne.moore@usdoj.gov
andrew.lay@usdoj.gov

/s/ Matthew B. Mock